



Via ECFS

Marlene Dortch, Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: CGM, LLC Notice of Ex Parte Presentation – WC Docket No. 11-42, CC Docket No. 96-45, and WC Docket No. 03-109

Dear Ms. Dortch,

On June 13 and 14, Kevin Murphy, Partner and Chuck Campbell, Partner participated in the FCC Workshop on Low Income Database Issues, pursuant to the FCC Notice of Proposed Rulemaking in the dockets referenced above, specific to the issues related to the National Database creation for Lifeline and Link up programs. This workshop was led by Kim Scardino, Cindy Spiers, and Jonathan Lechter of the Wireline Competition Bureau. In addition, Zachary Katz, Legal Advisor for Wireline Communications, International and Internet Issues to Chairman Genachowski, Sharon Gillett, Chief of the Wireline Competition Bureau, Trent Harkrader, Division Chief, Telecommunications Access Policy Division, and Carol Matter, Deputy Bureau Chief, Wireline Competition Division attended separately during the two day proceedings.

In addition to those named here, there were many other participants and attendees whose names are listed as an attachment to this letter.

CGM used a presentation, attached, to facilitate the database discussion of issued related to a national database and duplicate subsidies.



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This presentation and CGM Comments and presentation material attached accutately reflect CGM's position and comments relating to his proceeding, and are consistent with other comments filed by CGM pursuant to these proceedings.

This letter is being filed electronically pursuant to section 1.1206 of the Commissions' rules.

Sincerely,

Kevin Murphy – CGM – Partner

ATTACHMENT PRIVATE SECTOR ATTENDEES AT FCC LIFELINE LINK UP WORKSHOP June 13, 2011

Michael Quinn Solix
Eric Sequin Solix
Stuart Waldron Solix
Norina Moy Sprint

Mitchell Brecher Greenberg Traurig (TracFone)

Javier Rosado TracFone

John Nakahata Wiltshire & Grannis (GCI)

Donald Kratt 3PV 3PV David Brinkman Cathy Carpino AT&T Mike Tan AT&T Mary Henze AT&T Jerry James Comptel Comptel Mary Albert Barrett Sheridan **NASUCA** Frank Delcol Tag Wireless dPi Teleconnect Chuck Schneider Andrew Karl Sage Telecom

Terri Kruse ATMS

Matt Connolly Yourtel America

Alan Buzacott Verizon Karen Majcher USAC Pamela Gallant USAC

Ken Eisner One Economy

Chuck Campbell CGM Kevin Murphy CGM Eric Robeson West

Matthew Brill Latham & Watkins (Cricket)

Jarrett Taubman Latham & Watkins (Cricket)

Danielle Frappier Davis Wright Tremaine (Nexus)

Scott Bergmann CTIA

ATTACHMENT PRIVATE SECTOR ATTENDEES AT FCC LIFELINE LINK UP WORKSHOP June 14, 2011

Michael Quinn Solix
Eric Sequin Solix
Stuart Waldron Solix
Norina Moy Sprint

Mitchell Brecher Greenberg Traurig (TracFone)

Javier Rosado TracFone

John Nakahata Wiltshire & Grannis (GCI)

Donald Kratt 3PV 3PV David Brinkman Jeff Brueggeman AT&T Mike Tan AT&T Mary Henze AT&T Barrett Sheridan **NARUC** Jerry James Comptel Tag Wireless Frank Delcol dPi Teleconnect Chuck Schneider

Alan Buzacott Verizon

Ken Eisner One Economy

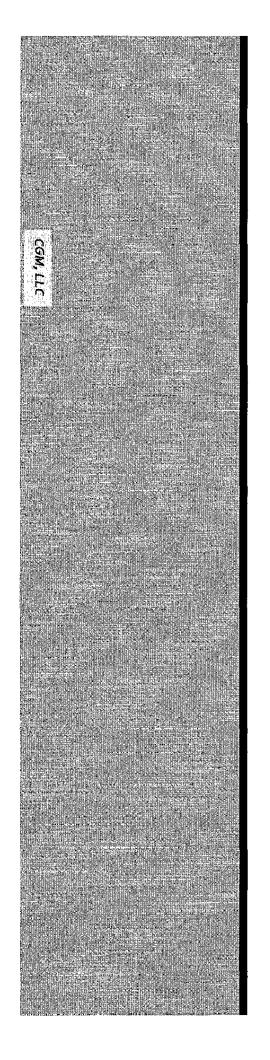
Chuck Campbell CGM Kevin Murphy CGM Eric Robeson West

Danielle Frappier Davis Wright Tremaine (Nexus)

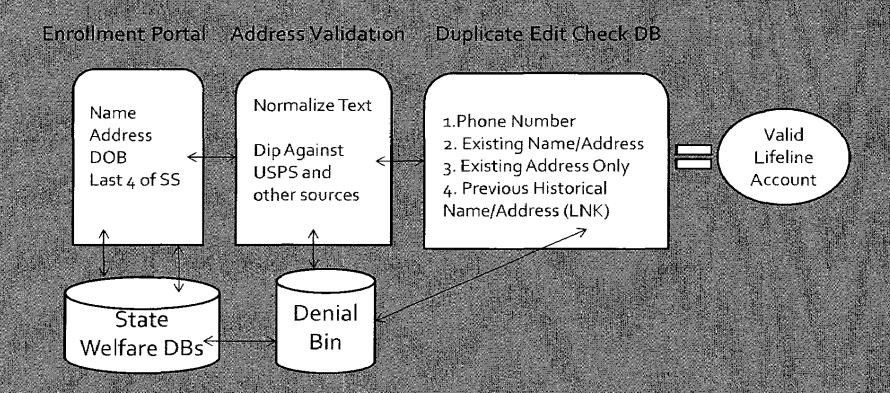
CGM, LLC

Low Income Enrollment & Fraud Management Platform

Presentation to the FCC – 6/13/11



Low Income Program: Proposed Enrollment & Fraud Management Platform



Prevents Eligibility Fraud and Phony Address

Prevents One-Per-Household Fraud

Benefits to the Consumer

Makes the Program/Subsidy More Accessible to Eligible, Unserved Consumers

- Simplifies Enrollment Process.
- Multiple Program Entry Points Consumer, Case Worker, ETC Service Provider
- Drive Take-Rate via State and ETC-Driven Awareness Campaign
- Estimated Eligibility Pool of 33MM. Estimated Take -Rate of 12MM (36%)

Benefits to the ETC Service Provider

Secures Lifeline Customer Base - Protects from Loss of Customers in a USAC or State Duplicate-Audit.

Evidences Responsible Stewardship and Would Likely Assist Their Efforts to Expand ETC Footprint.

Removes Poor/Unfair/Improper Practices from the Marketplace